



Elite Sports Professional Services



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Mission statement and values

In pursuit of our mission, we believe the following value statements are essential and timeless:

We recognise and affirm the unique and intrinsic worth of each individual.

We treat all those we serve with compassion and kindness.

We act with absolute honesty, integrity and fairness in the way we conduct our business and the way we live our lives.

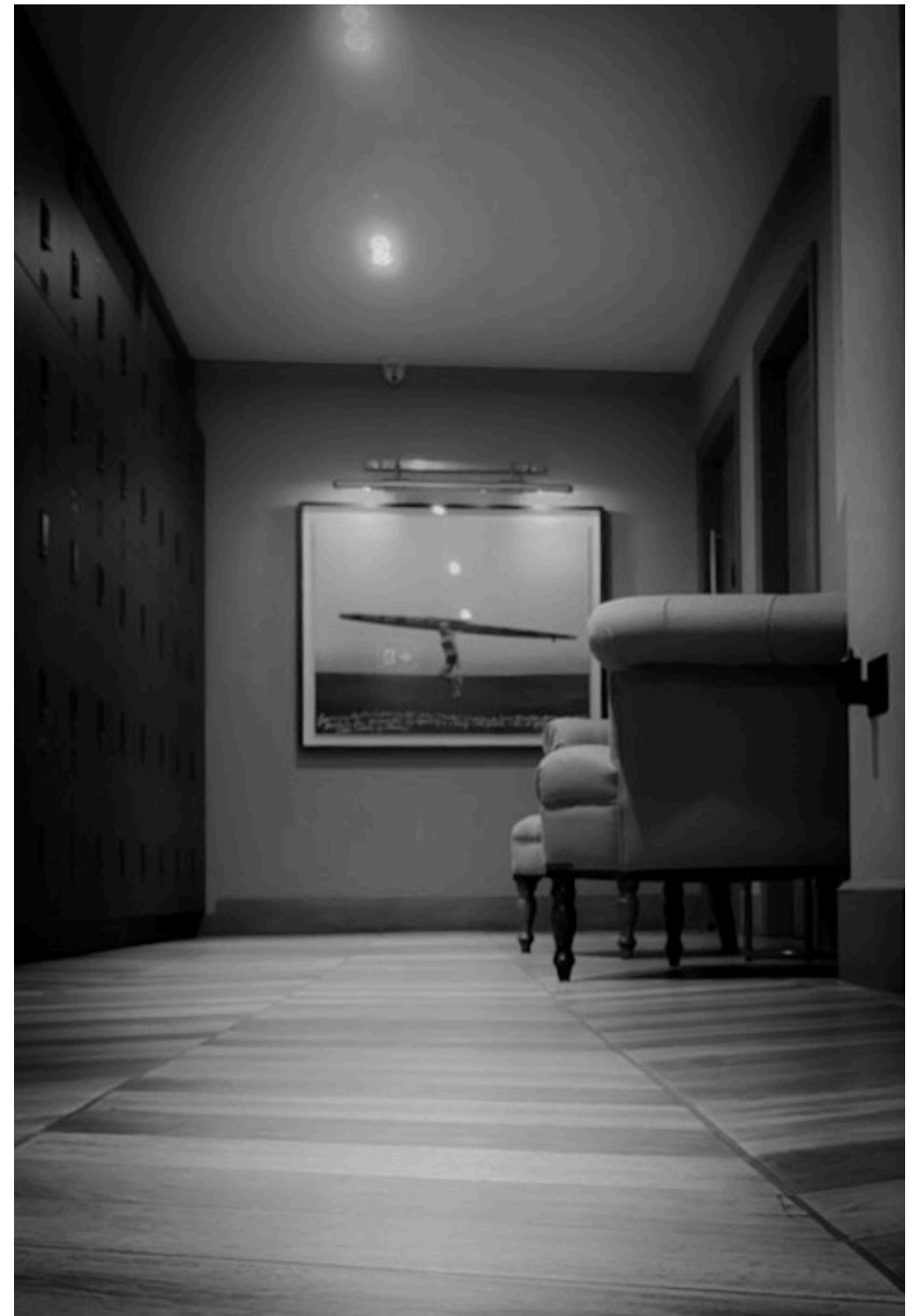
We trust our colleagues as valuable members of our healthcare team and pledge to treat one another with loyalty, respect and dignity.

Our values

Standards and Quality - commitment to the highest standards and the best quality healthcare

Embrace the journey - constantly changing and evolving to improve practice

Innovation - constantly looking at ways to improve systems and processes for the betterment of patient care





Purpose of our code of conduct

Our Code of Conduct provides guidance to all ESPS colleagues and helps us in carrying out our activities within appropriate ethical and legal standards. These obligations apply to our relationships with patients, affiliated physicians, third-party payers, subcontractors, independent contractors, vendors, consultants and with each other.

The Code is a critical component of our overall Ethics and Compliance Programme. We have developed the Code to ensure that we meet our ethical standards and comply with applicable laws and regulations.

We affirm these commitments to stakeholders:

To our patients:

We are committed to providing quality care that is sensitive, compassionate, promptly delivered and cost-effective.

To our colleagues:

We are committed to a work setting where all colleagues are treated with fairness, dignity and respect and which affords them an opportunity to grow, to develop professionally and to work in a team environment in which all ideas are welcomed.

To our doctors and consultants:

We are committed to providing a work environment which has excellent facilities, modern equipment and outstanding professional support.

To our business partners:

We are committed to dealing with our business partners in a way that demonstrates our commitment to contractual obligations, and reflects our shared concern for quality healthcare which is based on efficiency and cost-effectiveness. We want to do business with others who are ready to reflect our own ethical standards.

To our regulators:

We are committed to a corporate culture which promotes legal and regulatory compliance. We accept the responsibility to transparently self-govern and monitor adherence to the requirements of law and to our Code of Conduct.

To our partners:

We are committed to fully performing our responsibilities to manage our joint facility in a manner that reflects the mission and values of each of our organisations.

To the communities we serve:

We are committed to understanding the particular needs of the communities we serve and providing these communities quality, cost-effective healthcare.



Patients

Quality of care and patients' safety

Our goal is to provide high quality, cost- effective healthcare to all of our patients.

To that end, we are committed to the delivery of safe, effective, efficient, compassionate and satisfying care to patients. We treat all patients with warmth, respect and dignity and provide care that is both necessary and appropriate.

In promoting a high quality of care, our facility:

- focus on the attentiveness and dedication of service to patients;
- utilise evolving technology to promote quality of care and the safety of patients and an overall culture that makes the safety of patients paramount;
- have a comprehensive and effective approach to handling issues relating to the credentialing and privileging of members of the medical staff;
- undertake effective peer review mechanisms for their medical staff.
- The entire facility team is committed to the delivery of safe, effective, efficient, compassionate and satisfying care and services.

This commitment to quality of care and safety of patients is an obligation of every colleague. Accordingly, it is a fundamental principle of being part of ESPS that each person dedicates himself or herself to achieving the goals described here. In addition, in any circumstance where an ESPS colleague has a question about whether these standards relating to quality or the safety of patients are being fully met, that individual is obligated to raise this concern through appropriate channels until it is satisfactorily addressed and resolved. Such channels include those established at the facility and, if necessary, beyond – including the safeguarding policy.

ESPS has a zero tolerance approach to any form of violence or abuse at our facilities. Any violence or abuse directed at staff or other patients by staff, patients, relatives, contractors or members of the public is unacceptable and will not be tolerated. This includes the use of abusive language via social media platforms.

Patients' rights

ESPS complies with applicable UK legislation and does not discriminate on the basis of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation. We recognise and respect the diverse backgrounds and cultures of our patients and make every effort to equip our caregivers with the knowledge and resources to respect each patient's cultural needs.

Our facility respects the patient's right to, and need for, effective communication. We strive to ensure that patients and/or their representatives have the information necessary to exercise their rights.

Each patient is provided with a written statement of patients' rights and a Privacy Notice is available on the LIPS website as well as the clinic instagram page. This statement includes:

- the right of a patient to take decisions regarding medical care
- the right to refuse or accept treatment
- the right to informed decision making
- the patient's rights related to the maintenance of his or her health information.

Both documents conform to all applicable UK laws including, but not limited to, The General Data Protection Regulations 2016 (GDPR) and the Data Protection Act 2018.

We seek to involve patients in all aspects of their care, including giving consent for treatment and making healthcare decisions.

Patients have the right to refuse care, treatment, and services in accordance with the law and regulations. ESPS is expected to take reasonable steps to determine the patient's wishes concerning designation of a representative to exercise the patient's rights. The explicit designation of a representative takes precedence over any non-designated relationship.



Patients are provided information regarding their right to make advance directives regarding treatment decisions, financial considerations and the designation of surrogate healthcare decision- makers. Patient advance directives are honoured within the limits of the law and our organisation's mission, philosophy, values and capabilities.

In the promotion and protection of each patient's rights, each patient and his or her representatives are accorded appropriate confidentiality, privacy, security, advocacy and safeguarding services, opportunity for resolution of complaints and pastoral care or spiritual care. Patients have the right to an environment that preserves dignity and contributes to positive self-image.

ESPS will not use personal data for marketing purposes without obtaining consent. We will not sell personal data to a third party. Patients are free at any time to change their mind and to withdraw consent regarding marketing purposes. This will not affect the healthcare services ESPS offers to a patient.

The wellbeing of the patient is at the centre of our care model, and the same standards are applied regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation. Patients are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights and involvement in their own care.

The patient or patient's representative has the right to participate in the development and implementation of their plan of care. Patients receive information about the people who are responsible for their care, treatment and services. Patients (and, when appropriate, their families) are informed about the outcomes of care, treatment and services that have been provided, including unanticipated outcomes. Patients are also involved, as clinically appropriate, in resolving dilemmas about care decisions. The patient's rights include being able to request or refuse treatment. This is not, though, to be construed as a mechanism to demand treatment or services deemed medically unnecessary or inappropriate.

ESPS maintain an ongoing, proactive safety effort for the identification of risk to patients' safety and the prevention, reporting and reduction of healthcare errors. Patients have the right to formulate advance directives and to have facility staff and practitioners comply with these directives.

Patient safeguarding

ESPS is committed to safeguarding our patients, their families and the communities we serve. Safeguarding is embedded within our corporate and clinical structures and policies to enable us to fulfil our statutory safeguarding responsibilities.

Health organisations and all staff working within them, play an important part in safeguarding by:

- promoting the welfare of children, young people and vulnerable adults
- identifying and responding to any indication of abuse and neglect
- contributing to multi-agency safeguarding arrangements.

ESPS will support its staff to fulfil their safeguarding responsibilities by providing them with training relevant to their role, policies to guide them, and advice and support as part of our safeguarding escalation processes.

These requirements have been incorporated into our recruitment and disciplinary policies and procedures. In addition, guidance is provided on safeguarding during our employees' induction. For full details of the safeguarding procedures at ESPS, please refer to the Safeguarding Policies.



Patients' information

We collect information about the patient's medical condition, history, medication and family illnesses in order to provide quality care.

We recognise the sensitive nature of this information and are committed to maintaining its confidentiality. Consistent with data protection principles, we do not use, disclose or discuss patient-specific information, including patients' financial information, with others unless it is necessary to support the patient's care or permitted by law.

ESPS colleagues must never use or disclose confidential information in a way that is inconsistent with the privacy and security policies and procedures, which reflect data protection requirements.

No ESPS colleague, affiliated physician, or other healthcare partner has a right to any patient's information other than that which is necessary to perform his or her job.

Subject only to emergency exceptions, patients can expect their privacy to be protected and patient-specific information will be released only to persons authorised by the patient or permitted by applicable laws.

Physicians

Healthcare facilities like those owned and operated by ESPS reflect a collaboration between those who are part of ESPS and those who have been granted practising privileges to practise. As in any collaboration, each party has important roles and responsibilities. ESPS is committed to providing a work environment for physicians, and other privileged practitioners who practise in our facilities, that is excellent in all respects.

We encourage members of our medical staff to be familiar with this Code of Conduct. There are many sections of this Code of Conduct that pertain to ethical or legal obligations of physicians in clinics and this document is likely to be a helpful summary of those obligations for our medical staff members.

Applicable laws and regulations govern the relationship between healthcare facilities and physicians who may refer patients to the facilities. It is important that those colleagues who interact with physicians, particularly regarding making payments to physicians for services rendered, providing space or services to physicians, recruiting physicians to the community and arranging for physicians to serve in leadership positions in facilities, are aware of the requirements of the laws, regulations and policies that address relationships between facilities and physicians.

Interactions with physicians

We do not pay for referrals.

We accept referrals and admissions based solely on the patient's medical needs and our ability to render the needed services. We do not give, promise to give, or offer to give benefits (financial or otherwise) to anyone – colleagues, physicians, or other persons or entities – for referral of patients.

We do not accept payments for referrals we make.

No ESPS colleague or any other person acting on behalf of the organisation is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making referrals to another healthcare provider, we do not take into account the volume or value of referrals that the provider has made (or may make) to us.

Legal and regulatory compliance

ESPS provides varied healthcare services in the UK. These services are provided pursuant to applicable UK laws and regulations and the conditions of participation for Government healthcare programmes. Such laws, regulations and conditions of participation may include, but are not limited to, subjects such as certificates of need, licences, permits, accreditation, access to treatment, consent to treatment, medical record-keeping, access to medical records and confidentiality, patients' rights, safeguarding patients, clinical research, end-of-life care decision-making, medical staff membership and clinical privileges, and corporate practice of medicine restrictions.

We have developed policies and procedures to address many legal, accreditation, certification and regulatory requirements. However, it is impractical to develop policies and procedures that encompass the full body of applicable law, standards, conditions and regulation. Obviously, those laws, standards, conditions and regulations not covered in organisation policies and procedures must be followed. There is a range of expertise within the organisation, including numerous functional experts and responsible executives, who should be consulted for advice concerning human resources, data protection, legal and regulatory standards, and conditions of participation requirements.

Anyone who becomes aware of violations or who suspects violations of such laws, regulations, standards and conditions of participation, or Company policies and procedures, must report this immediately to a supervisor or member of senior management at ESPS and also through our governance partner at HCA Healthcare and London International Patient Services who provide independent oversight.

Slavery and human trafficking

Human trafficking involves an act of recruiting, transporting or transferring, harbouring, receiving, transferring or exchanging control over a person through a use of force, coercion, abuse of vulnerability, fraud or deception or other means, for the purpose of exploiting them.

ESPS is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour. ESPS is committed to promoting ethical and lawful employment and supply chain practices. These practices are also required to be followed by our suppliers, subcontractors or business partners worldwide.

ESPS will not tolerate slavery, servitude, forced or compulsory labour in the manufacture of products we use or sell and will not accept products or services from suppliers who employ or utilise slavery, servitude, forced or compulsory labour in any manner.

ESPS has in place a Human Trafficking Policy which sets out the obligations on staff, management and our supply chains to ensure that slavery and human trafficking does not occur.

Business and financial information

Accuracy, retention and disposal of documents and records

Each ESPS colleague is responsible for the integrity and accuracy of our organisation's documents and records, not only to comply with regulatory and legal requirements, but also to ensure that records are available to support our business practices and actions. No one may alter or falsify information on any record or document. Records must never be destroyed in an effort to deny authorities accurate information that may be relevant to a legal or regulatory investigation.

Medical and business documents and records are retained in accordance with the law and our record retention policy, which includes comprehensive retention schedules.

Medical and business documents include computer-based information such as email or computer files on disk and any other medium that contains information about the organisation or its business activities. It is important to retain and destroy records only according to our policy. ESPS colleagues must not tamper with records. No one may remove or destroy records prior to the specified date without first obtaining permission as outlined in ESPS records management policies. Finally, under no circumstances may an HCA UK colleague use a patient's, colleague's or any other individual's or entity's information to personally benefit (e.g. insider trading or marketing of the data).

Coding and billing for services

We have implemented policies, procedures and systems to facilitate accurate billing to third-party payers, insurance payers and patients. These policies, procedures and systems conform to applicable UK laws and regulations. We prohibit any colleague or agent of ESPS from knowingly presenting, or causing to be presented, claims for payment or approval which are false, fictitious or fraudulent.

In support of accurate billing, medical records must provide reliable documentation of the services we render. It is important that all individuals who contribute to medical records provide accurate information and do not destroy any information considered part of the official medical record. Accurate and timely documentation also depends on the diligence and attention of physicians who treat patients in our facilities. We expect those physicians to provide us with complete and accurate information in a timely manner. Any subcontractors engaged to perform billing or coding services are expected to have the necessary skills, quality control processes, systems and appropriate procedures to ensure all billings for Government and commercial insurance programmes are accurate and complete.

ESPS expects all such entities to have ethics and compliance programmes and Codes of Conduct. In addition, third-party billing entities, contractors and preferred vendors which are under contract consideration must be approved consistent with the relevant corporate policy.

Confidential information

The term 'confidential information' refers to proprietary information about our organisation's strategies and operations, as well as patients' information and third-party information. Improper use or disclosure of confidential information could violate legal and ethical obligations. ESPS colleagues may use confidential information only to perform their job responsibilities and must not share such information with others unless the individuals or entities have a legitimate need to know the information in order to perform their specific job duties to carry out a contractual business relationship. Such disclosure must not be prohibited by law or regulation.

Confidential information, also referred to as 'sensitive information,' covers virtually anything related to ESPS operations that is not publicly known, such as personnel data maintained by the organisation; patients' lists and clinical information (including individually identifiable information and clinical quality data); patients' financial information and NI numbers; passwords; pricing and cost data; information pertaining to acquisitions, divestitures, affiliations and mergers; financial data; details regarding Government and local tax examinations of the organisation or its joint venture partners; proprietary information from a research sponsor or the data generated from the research; strategic plans; marketing strategies and techniques; supplier and subcontractor information; and proprietary computer software. Sensitive data may also include photos and videos.

Due care and diligence is required at all times to maintain the confidentiality, availability and integrity of information assets the Company owns or of which it is the custodian. Because so much of our clinical and business information is generated and contained within our computer systems, it is essential that each ESPS colleague protects our computer systems and the information contained in them by not sharing passwords and by reviewing and adhering to our information security policies and standards.

Colleagues must protect sensitive information when it is emailed outside the Company or otherwise stored, posted or distributed through the internet; stored on portable devices such as laptops, tablets and mobile phones; or transferred to removable media such as CD or USB drive. These policies and standards require, among other things, that the individual and/or entity be validated and the information be encrypted. ESPS colleagues must be extremely careful in the use of social media, taking care to not disclose patients' information or other sensitive information whether at work or at home and using company or personal systems.

If an individual's employment or contractual relationship with ESPS ends for any reason, the individual is still bound to maintain the confidentiality of information viewed, received or used during the employment or contractual business relationship with ESPS. This provision does not restrict the right of a colleague to disclose, if he or she wishes, information about his or her own compensation, benefits, or terms and conditions of employment. Copies of confidential information in an employee's or contractor's possession shall be left with ESPS at the end of the employment or contractual relationship.

Electronic media

All communications systems, including but not limited to computers, electronic mail, intranet, internet access, Company- provided telephones and voicemail, are the property of the organisation and are to be used primarily for business purposes in accordance with electronic communications policies and standards. Limited reasonable personal use of ESPS communications systems is permitted, however, users should assume these communications are not private. Users of computer and facility telephonic systems should presume no expectation of privacy in anything they create, store, send, or receive on the computer and telephonic systems and ESPS reserves the right to monitor and/ or access communications usage and content consistent with ESPS policies and procedures. Colleagues may not use HCA UK devices or Company-provided communication channels or access to the internet or social media to view, post, store, transmit, download, or distribute any threatening materials; knowingly, recklessly, or maliciously distribute false materials; obscene materials; or anything constituting or encouraging a criminal offence, giving rise to civil liability, or otherwise violating any laws.



In addition, these channels of communication may not be used to send chain letters, personal broadcast messages, photos or videos, or copyrighted documents that are not authorised for reproduction.

Colleagues who abuse our communications systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action.

Colleagues shall comply with ESPS information security policies and standards governing the use of information systems. Individuals may only use User IDs assigned to them individually and are not permitted to share or disclose any user account that is used to access ESPS systems or information. Colleagues shall never use tools or techniques to break or exploit ESPS information security measures or those used by other companies or individuals.

Workplace conduct and employment practices

Conflict of interest

A conflict of interest may occur if an HCA UK colleague's outside activities, personal financial interests, or other personal interests influence or appear to influence his or her ability to make objective decisions in the course of the colleague's job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract a colleague from the performance of his or her job or cause the individual to use ESPS resources for other than ESPS purposes. ESPS colleagues are obligated to ensure they remain free of conflicts of interest in the performance of their responsibilities at ESPS. If colleagues have any questions about whether an outside activity or personal interest might constitute a conflict of interest, they must obtain the written approval of their line manager before pursuing the activity or obtaining, divesting or retaining the interest.

Clinical decisions will be made without regard to compensation or financial risk to ESPS leaders, managers, clinical staff, or licensed, independent practitioners.

Controlled substances

Some of our colleagues routinely have access to prescription drugs and other medical supplies. Many of these substances are governed and monitored by specific regulatory organisations and must be administered by physician order only. Prescription and controlled medications and supplies must be handled properly and only by authorised individuals to minimise risks to us and to patients. If an individual becomes aware of inadequate security of drugs or controlled substances or the diversion of drugs from the organisation, the incident must be reported immediately. ESPS strictly enforce reporting of any violations of diverting medications by facility staff or privileged practitioners.

Diversity and equal employment opportunity

ESPS actively promotes diversity in its workforce at all levels of the organisation. We are committed to providing an inclusive work environment where everyone is treated with fairness, dignity and respect. We will make ourselves accountable to one another for the manner in which we treat one another and for the manner in which people around us are treated. We are committed to recruit and retain a diverse staff reflective of the patients and communities we serve. We regard laws, regulations and policies relating to diversity as a minimum standard. We strive to create and maintain a setting in which we celebrate cultural and other differences and consider them strengths of the organisation. ESPS is committed to delivering the highest possible levels of fairness, equality and opportunity for all our colleagues. ESPS is an equal opportunity workforce and no one shall discriminate against any individual with regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation with respect to any offer, or term or condition, of employment.

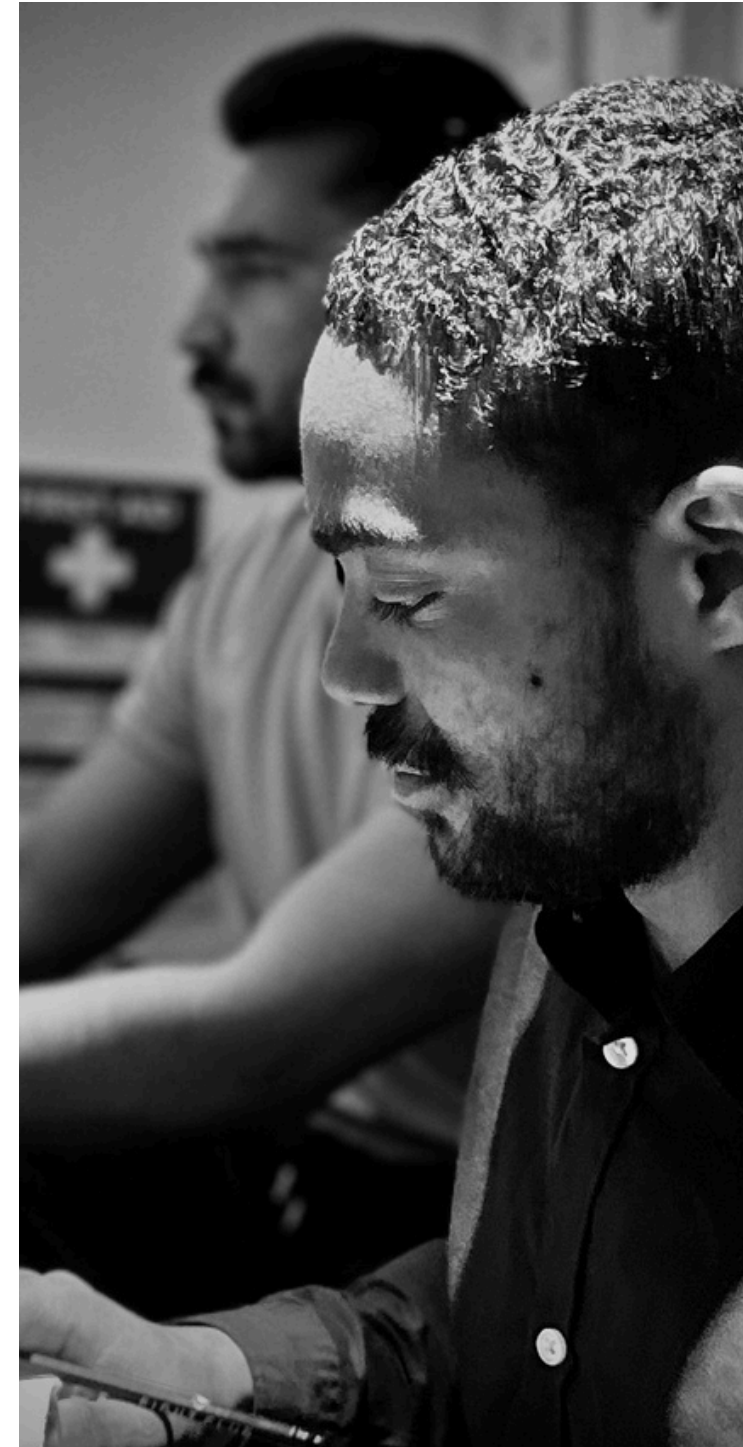
We make reasonable accommodations to the known physical and mental limitations of qualified individuals with disabilities.

Harassment and workplace violence

Each ESPS colleague has the right to work in an environment free of harassment and disruptive behaviour. We do not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace.

The prohibition of sexual harassment includes unwelcome sexual advances or requests for sexual favours in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment has no place at ESPS.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery and other commercial crimes, stalking, violence directed at the employer, terrorism and hate crimes committed by current or former colleagues. Colleagues who observe or experience any form of harassment or violence should report the incident to their supervisor or the Human Resources Department in the first instance.



Health and safety

ESPS complies with relevant Government regulations and rules, ESPS policies and facility practices that promote the protection of workplace health and safety. Our policies have been developed to protect our colleagues from potential workplace hazards. Colleagues must become familiar with and understand how these policies apply to their specific job responsibilities and seek advice from their supervisor or their facility health and safety contact whenever they have a question or concern. It is important that each colleague immediately advises his or her supervisor or facility health and safety contact of any serious workplace injury or any situation presenting a danger of injury so timely corrective action may be taken to resolve the issue.

Licence and certification renewals

Colleagues, individuals who act as independent contractors and privileged practitioners in positions which require professional licences, certifications, or other credentials, are responsible for maintaining the current status of their credentials and shall comply at all times with the law. To ensure compliance, ESPS may require evidence of the individual's having a current licence or credential status and insurance coverage.

ESPS does not allow any colleague, independent contractor or privileged practitioner to work without valid, current licences or credentials. Each colleague must have evidence of current and valid licences, certification, registration, accreditation or credential as required by their position description. Each facility must have appropriate processes and procedures to ensure documentation of compliance with these procedures.



Substance abuse

To protect the interests of our colleagues and patients, we are committed to an alcohol-free and drug-free work environment. All colleagues must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol; having an illegal drug in your system; or using, possessing, or selling illegal drugs while on ESPS work time or property may result in immediate termination of employment or contract.

It is also recognised individuals may be taking prescription or over-the-counter drugs, which could impair judgement or other skills required in job performance. Colleagues with questions about the effect of such medication on their performance, or who observe an individual who appears to be impaired in the performance of his or her job, must immediately consult with their supervisor.

ESPS complies with relevant Government regulations and rules, ESPS policies and facility practices that promote the protection of workplace health and safety.

Our policies have been developed to protect our colleagues from potential workplace hazards. Colleagues must become familiar with and understand how these policies apply to their specific job responsibilities and seek advice from their supervisor or their facility health and safety contact whenever they have a question or concern. It is important that each colleague immediately advises his or her supervisor or facility health and safety contact of any serious workplace injury or any situation presenting a danger of injury so timely corrective action may be taken to resolve the issue.

Bribery Act

The UK Bribery Act 2010 (The Bribery Act) requires us to exercise care in our dealings with anyone who performs services for the benefit of ESPS. This includes, but is not limited to, employees, consultants, overseas agents, suppliers and subsidiaries. The Bribery Act prohibits providing any financial or other benefit to individuals or businesses in both public and private enterprise, as well as to foreign public officials for the purpose of influencing the improper performance of an activity or function. Under The Bribery Act.

Before offering anything of value to a potential referral source, foreign public officials or any person or entity in business with ESPS an ESPS colleague must follow ESPS policies on anti-corruption, entertainment and business courtesies.

Environmental compliance

ESPS complies with all environmental laws and regulations as they relate to our organisation's operations. We act to preserve natural resources to the fullest extent reasonably possible. We operate each of our facilities with the necessary permits, approvals and controls. We diligently employ the proper procedures to provide a good environment of care and to prevent pollution.

In helping ESPS comply with these laws and regulations, all HCA UK colleagues must understand how job duties may impact the environment, adhere to all requirements for the proper handling of hazardous materials, and immediately alert supervisors to any situation regarding the discharge of a hazardous substance, improper disposal of hazardous and medical waste, or any situation which may be potentially damaging to the environment.



Business courtesies

Gifts. It is critical to avoid the appearance of impropriety when giving gifts to individuals who do business or are seeking to do business with ESPS. We never use gifts or other incentives to improperly influence relationships or business outcomes. In order to avoid embarrassment, an effort should be made to ensure that any gift we extend meets the business conduct standards of the recipient's organisation too.





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